

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

ANNUAL COMPLIANCE REVIEW, 2022

Docket No. ACR2022

**RESPONSES OF THE UNITED STATES POSTAL SERVICE TO
QUESTIONS 1-19 OF CHAIRMAN'S INFORMATION REQUEST NO. 11**

The United States Postal Service hereby provides its responses to the above-listed questions of Chairman's Information Request No. 11, issued on February 8, 2023. Each question is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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February 15, 2023

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO CHAIRMAN'S INFORMATION REQUEST NO. 11**

1. Please refer to the Response to Chairman's Information Request (CHIR) No. 7, question 14.¹ Please confirm whether International Money Transfer Service (IMTS)-Inbound money orders can be cashed if an agreement providing IMTS-Inbound has been terminated.
 - a. If confirmed, please indicate how long after an agreement has been terminated that associated money orders may still be cashed. In the response, please specify whether this varies by agreement or is the same for all agreements.
 - b. If not confirmed, please explain.

RESPONSE:

- a-b. Not confirmed. Changes in the availability of inbound international postal money order service to countries and localities are published in the *Postal Bulletin* and then implemented by revisions to International Mail Manual (IMM) Exhibit 371.2. The final paragraphs of the response to this question review the timeline for recent terminations in the availability of inbound international postal money order service to certain countries and localities, as set forth in *Postal Bulletin* notices.

The standard process is to publish notice in the *Postal Bulletin* of

- a last day for sale of inbound international postal money orders from a certain country or locality, and
- a last day for cashing of inbound international postal money orders from that country or locality.

¹ Responses of the United States Postal Service to Questions 1-30 of Chairman's Information Request No. 7, February 3, 2023 (Response to CHIR No. 7).

RESPONSES OF THE UNITED STATES POSTAL SERVICE TO CHAIRMAN'S INFORMATION REQUEST NO. 11

As is evident in the *Postal Bulletin* notices discussed below, some variation has occurred in the time periods between

- publication of notice in the *Postal Bulletin* of termination of the exchange of inbound international postal money orders to a certain country or locality,
- the last day for sale of inbound international postal money orders from that country or locality, and
- the last day for cashing of inbound international postal money orders from that country or locality.

Once both sales of and cashing of inbound international postal money order service from a certain country or locality have been terminated, inbound international postal money order service from that country or locality is no longer listed as available in IMM Exhibit 371.2, and an inbound international postal money order from that country or locality

- may not be cashed at a U.S. Post Office™ facility and
- cannot be processed without rejection or return through the Federal Reserve Bank for payment in the United States by the United States Postal Service.

The following paragraphs review the timelines for the cashing of inbound international postal money order service, in recent terminations of international postal order service from certain countries and localities, as set forth in *Postal Bulletin* notices.

RESPONSES OF THE UNITED STATES POSTAL SERVICE TO CHAIRMAN'S INFORMATION REQUEST NO. 11

For Trinidad and Tobago, inbound international postal money order service was removed from IMM Exhibit 371.2 on January 1, 2023. On October 21, 2021, and November 17, 2022, *Postal Bulletin* notices were published concerning that termination, which stated that inbound international postal money orders issued by Trinidad and Tobago Postal Corporation, the designated postal operator of Trinidad and Tobago, must be cashed at a U.S. Post Office™ facility by the expiration of the validity date on the money order or before January 1, 2023, whichever comes first.²

For Anguilla, Antigua and Barbuda, Bahamas, Barbados, British Virgin Islands, Dominica, Grenada, Jamaica, Montserrat, Saint Kitts and Nevis, Saint Lucia, as well as Saint Vincent and the Grenadines, inbound international postal money order service to those countries and localities was removed from IMM Exhibit 371.2 on October 1, 2022. On July 29, 2021, and August 11, 2022, *Postal Bulletin* notices were published concerning those terminations, which stated that inbound international postal money orders from those countries must be cashed at a U.S. Post

² See IMM Revision: Termination of International Postal Money Order Service, *Postal Bulletin* 22583 (Oct. 21, 2021), available at https://about.usps.com/postal-bulletin/2021/pb22583/html/updt_001.htm; IMM Revision: Termination of International Postal Money Order Service for Trinidad and Tobago, *Postal Bulletin* 22611 (November 17, 2022), at https://about.usps.com/postal-bulletin/2022/pb22611/html/updt_005.htm.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO CHAIRMAN'S INFORMATION REQUEST NO. 11**

Office™ facility by the expiration of the validity date on the money order or before October 1, 2022, whichever comes first.³

For Japan, inbound international postal money order service was removed from IMM Exhibit 371.2 on March 31, 2020. On December 19, 2019, and March 12, 2020, *Postal Bulletin* notices were published concerning that termination. As set forth in the notice published on March 12, 2020, inbound international postal money orders issued by Japan Post must be cashed at a U.S. Post Office™ facility before March 31, 2020.⁴

For Canada, inbound international postal money order service was removed from IMM Exhibit 371.2 on August 30, 2019. On August 15, 2019, and August 30, 2019, *Postal Bulletin* notices were published concerning that termination. As set forth in the notice published on August 30, 2019, inbound international postal money orders issued by Canada

³ See IMM Revision: Termination of International Postal Money Order Service, *Postal Bulletin* 22577 (July 29, 2021), at https://about.usps.com/postal-bulletin/2021/pb22577/html/updt_005.htm; and IMM Revision: Termination of International Postal Money Order Service, *Postal Bulletin* 22604 (August 11, 2022), at https://about.usps.com/postal-bulletin/2022/pb22604/html/updt_002.htm.

⁴ See Japan Post to Stop Issuing International Postal Money Orders Destined for the United States, *Postal Bulletin* 22535 (December 19, 2019), at https://about.usps.com/postal-bulletin/2019/pb22535/html/info_004.htm#ep1482326; Postal Service to Terminate International Postal Money Order Service with Japan Post, *Postal Bulletin* 22541 (March 12, 2020), at https://about.usps.com/postal-bulletin/2020/pb22541/html/info_006.htm#:~:text=n%20The%20Postal%20Service%20will,facility%20before%20March%2031%2C%202020.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO CHAIRMAN'S INFORMATION REQUEST NO. 11**

Post must be cashed at a U.S. Post Office™ facility before August 30, 2019.⁵

For Albania, El Salvador, and Guyana, inbound international postal money order service was removed from IMM Exhibit 371.2 on July 29, 2021,⁶ because, on further review, it was determined that the international postal money order agreements with the postal operators of those countries provided for only outbound international postal money order service. Thus, IMM Exhibit 371.2 was corrected accordingly. There are no records of any inbound international postal money orders from those countries.

⁵ See Canada Post to Terminate International Postal Money Order Service, *Postal Bulletin* 22526 (August 15, 2019), at https://about.usps.com/postal-bulletin/2019/pb22526/html/info_007.htm#ep1470454; IMM Revision: Termination of International Postal Money Order Service with Canada Post, *Postal Bulletin* 22527 (August 29, 2019), at https://about.usps.com/postal-bulletin/2019/pb22527/html/updt_002.htm.

⁶ See IMM Revision: Termination of International Postal Money Order Service, *Postal Bulletin* 22577 (July 29, 2021), at https://about.usps.com/postal-bulletin/2021/pb22577/html/updt_005.htm.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO CHAIRMAN'S INFORMATION REQUEST NO. 11**

2. Please provide estimates of IMTS-Inbound money orders issued in Fiscal Year (FY) 2022 that were not cashed and may be cashed in the future.

RESPONSE:

The Postal Service has not received any inbound international postal money orders since September 2022.

The Postal Service does not know the number of inbound international postal money orders destined for the United States that have been issued but have not been cashed yet.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO CHAIRMAN'S INFORMATION REQUEST NO. 11**

3. Please see Attachment, filed under seal.

RESPONSE:

Please see the response filed under seal as part of USPS-FY22-NP40.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO CHAIRMAN'S INFORMATION REQUEST NO. 11**

4. Please refer to the Response to CHIR No. 7, question 19, related to Address Management Services (AMS).⁷
- a. In the response, the Postal Service provided Revenue, Pieces, and Weight (RPW) revenue and direct labor costs for each service (*i.e.*, subproduct) in AMS.⁸ However, for several of those subproducts (*i.e.*, Address Sequencing, Address Element Correction II, Address Information System Viewer, Delivery Point Validation System, Extended Mail Forwarding, Location Address Conversion Service, Official National Zone Charts, and Residential Delivery Indicator Service) the Postal Service provided revenues, but not direct labor costs. *See id.* For these services, please confirm that there were no direct labor costs attributable to them and that their only relevant costs are joint costs caused by the collection of AMS services related to General Management, Supplies and Services, and IT. *See id.*, question 19.b. If not confirmed, please update the file provided with the Response to CHIR No. 7, question 19.b. and provide the relevant costs.
 - b. Please confirm that the Postal Service uses the In-Office Cost System (IOCS) to attribute costs to the AMS subproducts. If not confirmed, please describe the methodology used for each subproduct.
 - c. Revenue for AMS increased from \$14.7 million in FY 2021 to \$27.8 million in FY 2022, with a related cost coverage improvement of 274.74 percentage points between FY 2021 and FY 2022. Response to CHIR No. 7, question 19.a. The Commission observes that the revenue increase is primarily driven by three subproducts: Delivery Sequence File – 2nd Generation (DSF2) Service, Extended Mail Forwarding, and National Change of Address (NCOA Link) Service.⁹
 - i. Please discuss the drivers underlying the revenue increase of \$1,797,292 between FY 2021 and FY 2022 for DSF2 including relevant price increases, volume shifts, or any other contributing factors.
 - ii. Please discuss the drivers underlying the \$6,039,259 in revenue for Extended Mail Forwarding including volume and any other contributing factors. In the response, please elaborate on the

⁷ Responses of the United States Postal Service to Questions 1-30 of Chairman's Information Request No. 7, February 3, 2023, question 19 (Response to CHIR No. 7).

⁸ Response to CHIR No. 7, Zip file "ACR22_ChIR 7_USPS Resp Public Attachments.zip," folder "ChIR 7 Q 19," Excel file "ChIR No. 7 Q19B.xlsx."

⁹ *Id.*, Zip file "ACR22_ChIR 7_USPS Resp Public Attachments.zip," folder "ChIR 7 Q 19," Excel file "ChIR No. 7 Q19B.xlsx."

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO CHAIRMAN'S INFORMATION REQUEST NO. 11**

factors that caused this subproduct in its first year to comprise 21.71 percent of the total FY 2022 AMS revenue.

- iii. Please discuss the drivers underlying the revenue increase of \$4,475,367 between FY 2021 and FY 2022 for NCOA Link including relevant price increases, volume shifts, or any other contributing factors.
- d. Costs for AMS increased only 1.26 percent between FY 2021 and FY 2022, from \$4.62 million in FY 2021 to \$4.68 million in FY 2022. Please explain why revenue increases far outpaced cost increases between FY 2021 and FY 2022 for this product. In the response, please discuss ways in which the Postal Service actively tried to limit AMS costs and whether the Postal Service implemented any specific strategies related to cost minimization.

RESPONSE:

- a. Confirmed.
- b. Not Confirmed. The direct labor costs by subproduct are purely the contractor hours multiplied by an applicable wage rate charged to each subproduct.
- c. i. DSF2 Service received a price increase of 7.32 percent on August 29, 2021, and a 6.82 percent increase on July 10, 2022, which partially contributed to the increase in revenue in FY 2022. The main driver for the increase in revenue was the increase in volume. There were 12 total purchases of the DSF2 service in FY 2021 compared to 33 in FY 2022. As DSF2 is a low volume-high price product (the most expensive subproduct being \$141,000 after the July 2022 price change, and this is the product with the most volume), large shifts in volume will lead to large increases in revenue.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO CHAIRMAN'S INFORMATION REQUEST NO. 11**

ii. Extended Mail Forwarding has been a popular product that has led to strong volume and revenue. Extended Mail Forwarding accounts for 21.71 percent of AMS revenue in FY 2022 AMS revenue, as most AMS products have an annual revenue less than \$50,000. Only 3 products had revenues greater than \$1 million in FY 2022 (Computerized Delivery Sequence, DSF2, and NCOA Link). As a result, Extended Mail Forwarding's successful implementation has led to a large impact on total AMS.

iii. The NCOA Link product volume grew by 25 percent between FY 2021 and FY 2022, while receiving a 7.10 percent price increase on August 29, 2021 and a 7.44 percent increase on July 10, 2022. The revenue increases of \$2.4 million in Full Service Provider, and \$2.6 million in Limited Service Provider services account for almost all of the revenue increase in NCOA Link Product.

d. The Postal Service had no specific cost savings initiatives or strategies related to AMS products. The stability of costs attributed to AMS products experienced between FY 2021 and FY 2022 is illustrative of the fact that many of these AMS products and services are largely automated and are not as susceptible to increases in wages. Given the combination of stable costs and higher prices for AMS, it follows that revenue growth would outpace cost increases for the AMS product.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO CHAIRMAN'S INFORMATION REQUEST NO. 11**

5. Please refer to each tab in Library Reference USPS-FY22-37, December 29, 2022, Excel file "IOCS CV Summary FY22 Public.xlsx," in which the Postal Service identifies the "Cost Estimate" (Cost Est.) and the "Mean."
- a. Please define the "Mean" for all tabs and how it was derived.
 - b. Please explain why the "Cost Est." differs from the "Mean."
 - c. Please explain why the "Cost Est." was used as the denominator and not the "Mean" to calculate the Coefficient of Variation (CV).

RESPONSE:

- a. The "Mean" is the sample mean of the specified cost estimate taken over the iterations of the bootstrap procedures for the cluster and non-cluster IOCS data. In the bootstrap, the IOCS data are repeatedly resampled and product cost estimates are produced using the resampled data from each iteration of the resampling process. The cost estimates from each iteration are collected and sample means and variances are collected and sample means (and variances) are computed from the resulting datasets.
- b. The "Cost Est." values are the specified cost estimates using the actual IOCS data. The cost estimates from each iteration of the bootstrap, which enter into the calculation of the "Mean" values, will vary from the cost estimates because each replicate sample differs from the actual IOCS dataset from which it is drawn. (The bootstrap procedure uses this variation to represent the sampling distributions of the estimates.) For any finite set of replicate samples, the values of the "Mean" therefore will differ from the "Cost Est."
- c. The standard definition of the CV is in terms of the ratio of the population standard deviation to the population mean. Statistically consistent sample CVs can be

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO CHAIRMAN'S INFORMATION REQUEST NO. 11**

obtained from using any statistically consistent estimate of the population means, including the actual cost estimates. Additionally, development of the cost estimates themselves is documented in supporting materials for the ACR. Finally, as a practical matter, the differences in the sample CVs from using the cost estimates rather than the bootstrap means are small and analytically insignificant.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO CHAIRMAN'S INFORMATION REQUEST NO. 11**

6. Please refer to Library Reference USPS-FY22-37, Excel file "IOCS CV Summary FY22 Public.xlsx," tab "Mail Proc," cell A1, wherein the Postal Service identifies the "[s]ource for means and variances" as "boot_cra_mp.22.2000." Please provide the location of this file.

RESPONSE:

The file "boot_cra_mp.22.2000" is not separately provided in USPS-FY22-37 or another ACR folder. This file contains the mean and variance data provided in columns C and D of the tab "Mail Proc." in plain text format and thus provides no information not contained in "IOCS CV Summary FY22 Public.xlsx."

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO CHAIRMAN'S INFORMATION REQUEST NO. 11**

7. Please refer to Library Reference USPS-FY22-37, Excel file "IOCS CV Summary FY22 Public.xlsx," under the "Admin," "Claim Inq," and "Window" tabs at cell A1, wherein the Postal Service identifies the "[s]ource for means and variances" as "boot_cra_admwin.22.2000." Please provide the location for this file.

RESPONSE:

The file "boot_cra_admwin.22.2000" is not separately provided in USPS-FY22-37 or another ACR folder. This file contains the mean and variance data provided in columns C and D of the "Admin," "Claim Inq," and "Window" tabs in plain text format and thus provides no information not contained in "IOCS CV Summary FY22 Public.xlsx."

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO CHAIRMAN'S INFORMATION REQUEST NO. 11**

8. Please refer to Library Reference USPS-FY22-37, Excel file "IOCS CV Summary FY22 Public.xlsx," tab "CityCarriers," cell A1, wherein the Postal Service identifies the "[s]ource for means and variances" as Excel file "tally22q4_CLv2_bc.sas7bdat & boot_clus_carr_FY22.xlsx." Please provide the location for this file.

RESPONSE:

The referenced file "boot_clus_carr_FY22.xlsx" is being provided under seal in USPS-FY22-NP40. The SAS dataset "PRCPubCL22.sas7bdat" provided in USPS-FY22-37 is the public equivalent to the tally22q4_CLv2_bc.sas7bdat.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO CHAIRMAN'S INFORMATION REQUEST NO. 11**

9. Please refer to Library Reference USPS-FY22-37, Excel file "IOCS CV Summary FY22 Public.xlsx," tab "Supervisors(NonCluster)," cell A1, wherein the Postal Service identifies the "[s]ource for means and variances as "boot_super.22.2000." Please provide the location for this file.

RESPONSE:

The file "boot_super.22.2000" is not separately provided in USPS-FY22-37 or another ACR folder. This file contains the mean and variance data provided in columns C and D of the tab "Supervisors(NonCluster)" in plain text format and thus provides no information not contained in "IOCS CV Summary FY22 Public.xlsx."

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO CHAIRMAN'S INFORMATION REQUEST NO. 11**

- 10.** Please refer to Library Reference USPS-FY22-37, Excel file "IOCS CV Summary FY22 Public.xlsx," tab "CarrierAsSupervisor," cell A1, wherein the Postal Service identifies the source for means and variances as Excel file "tally22q4_CLv2_bc.sas7bdat&boot_clus_carrsupv_FY22.xlsx." Please provide the location for this file.

RESPONSE:

The referenced file "boot_clus_carrsupv_FY22.xlsx" is being provided under seal in USPS-FY22-NP40. The SAS dataset "PRCPubCL22.sas7bdat" provided in USPS-FY22-37 is the public equivalent to the tally22q4_CLv2_bc.sas7bdat.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO CHAIRMAN'S INFORMATION REQUEST NO. 11**

- 11.** Please refer to the Response to CHIR No. 7, question 30, regarding the impact that the service standard changes proposed in Docket No. N2021-1 had on the FY 2022 service performance scores for First-Class Mail. Please confirm that the responses are the same in all material respects regarding the impact that the service standard changes proposed in Docket No. N2021-1 had on the FY 2022 service performance scores for Periodicals. If not confirmed, please explain.

RESPONSE:

Confirmed.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO CHAIRMAN'S INFORMATION REQUEST NO. 11**

- 12.** Please refer to the Postal Service's responses to information requests in Docket No. ACR2021, in which it explains that it is unable to isolate and quantify the impact of individual improvement initiatives on service performance results.¹⁰
- a. Please confirm that the Postal Service remains unable to isolate and quantify the impact of individual improvement initiatives on service performance results.
 - b. If not confirmed, please identify for which improvement initiatives the Postal Service can isolate and quantify the impact on service performance results, identify the metrics used, and provide such quantification.

RESPONSE:

- a. Confirmed.
- b. Not applicable.

¹⁰ See, e.g., Docket No. ACR2021, Responses of the United States Postal Service to Questions 1-36 of Chairman's Information Request No. 2, January 25, 2022, questions 8.a.-c., 26.b.-d., 27.c.-d., 28.b.-c., 29.b.-d., 31.b.-d.; Docket No. ACR2021, Responses of the United States Postal Service to Questions 1-15 of Chairman's Information Request No. 6, February 1, 2022, question 2.b., 3.b.-c., e., 13.b.; Docket No. Responses of the United States Postal Service to Questions 1-21 of Chairman's Information Request No. 11, February 11, 2022, questions 8.c.-e., 9.b.-c., 10.c.-d.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO CHAIRMAN'S INFORMATION REQUEST NO. 11**

- 13.** Please refer to Docket No. N2021-1 regarding changes in the mode of transportation for First-Class Mail and end-to-end Periodicals. Please also refer to the Postal Service's Response to CHIR No. 8, question 3, regarding the impact of these changes on First-Class Mail.¹¹
- a. Please provide the percentage of Periodicals volume using air transportation at the beginning of FY 2022 and the end of FY 2022.
 - b. Please provide the percentage of Periodicals origin-destination pairs using air transportation at the beginning of FY 2022 and the end of FY 2022.
 - c. Please provide an estimate for the cost savings that were achieved during FY 2022 by the shift of Periodicals from air transportation to ground transportation and an explanation for how the cost savings were calculated.

RESPONSE:

a-c. For origin / destination lane pairs where First-Class Mail is transported via the air network, the Postal Service intentionally directs Periodicals through the NDC surface network. By design, Periodicals are not intended to utilize the air network. It is reasonable to expect some leakage occurs, however, in instances where mixed Periodicals are processed with First-Class Mail. In those cases, the weight and cube assigned to the air network would each reflect a small contribution from Periodicals, but those Periodicals contributions are indistinguishable from First-Class Mail in our data systems that track handling units transported through the air network.

Notwithstanding those circumstances, sample data from the Transportation Cost System (TRACS) show a reduction of 19 percent in the Periodicals pounds flown from FY 2021 to FY 2022, using a similar methodology to that described in the response to

¹¹ Responses of the United States Postal Service to Questions 1-3 of Chairman's Information Request No. 8, February 6, 2023 (Response to CHIR No. 8).

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO CHAIRMAN'S INFORMATION REQUEST NO. 11**

ChIR No. 8, question 3c. However, because the amount of Periodicals transported by air is so small, these TRACS estimates are subject to a large degree of sampling variability. The coefficients of variation (CVs) on the FedEx Day, Commercial Air, and UPS Periodicals transportation costs are 15-30 percent (see USPS-FY22-36, TRACS CV FY2022 (Public).xlsx). Thus, a 19 percent reduction in the pounds flown for Periodicals is not a statistically significant difference. Therefore, no data are available to estimate the cost savings that were achieved during FY 2022 by the shift of Periodicals from air transportation to ground transportation. This is consistent with the fact that no savings were projected in Docket No. N2021-1 specifically related to the shift of Periodicals from air to ground.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO CHAIRMAN'S INFORMATION REQUEST NO. 11**

14. Please see Attachment, filed under seal.

RESPONSE:

Please see the response filed under seal as part of USPS-FY22-NP40.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO CHAIRMAN'S INFORMATION REQUEST NO. 11**

15. Please see Attachment, filed under seal.

RESPONSE:

Please see the response filed under seal as part of USPS-FY22-NP40.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO CHAIRMAN'S INFORMATION REQUEST NO. 11**

16. Please see Attachment, filed under seal.

RESPONSE:

Please see the response filed under seal as part of USPS-FY22-NP40.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO CHAIRMAN'S INFORMATION REQUEST NO. 11**

17. Please see Attachment, filed under seal.

RESPONSE:

Please see the response filed under seal as part of USPS-FY22-NP40.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO CHAIRMAN'S INFORMATION REQUEST NO. 11**

18. Please see Attachment, filed under seal.

RESPONSE:

Please see the response filed under seal as part of USPS-FY22-NP40.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO CHAIRMAN'S INFORMATION REQUEST NO. 11**

19. Please see Attachment, filed under seal.

RESPONSE:

Please see the response filed under seal as part of USPS-FY22-NP40.